

# Exhibit N

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## Code of Conduct

*a guide to business ethics,  
workplace conduct and compliance*

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**Dear RMC Colleague,**

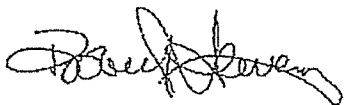
Ridgeview Medical Center's compliance program is an important part of the way we conduct ourselves while at work. The program is based on our mission and values, and is incorporated into our daily activities, supporting our culture of caring. We continually strive to deliver care with kindness and compassion, and act with the highest degree of integrity in how we do our work and the way we live our lives. Our compliance program includes this Code of Conduct, our Corporate Compliance Plan and our policies and procedures that relate to compliance matters.

The Code of Conduct provides guidance as to how we conduct business in an ethical and legal manner and in line with our mission and values. It describes the commitment to compliance that all who work with Ridgeview are expected to fulfill, including all management, employees and contractors. The standards contained in this Code of Conduct are important. In this Code of Conduct you will find information to assist you in proper decision-making, and guidelines to follow should you have questions or encounter any situation that you believe violates this Code of Conduct. You have our assurance there will be no retribution for asking questions or raising concerns for reporting possible improper conduct or compliance violations.

We have a strong culture at Ridgeview for doing the right thing. We are committed to be an organization that lives by the values and behaviors that sustain Ridgeview's tradition of caring.

Please assist me, and your colleagues, in supporting the values and principles that help us uphold the Ridgeview culture.

Sincerely,



Robert Stevens  
President/CEO

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Ridgeview Medical Center recognizes its corporate accountability as a responsible participant in programs serving the needs of its patients. Ridgeview Medical Center's Compliance Plan provides a system for the organization to comply with all applicable laws and regulations. To carry out its mission in accordance with its values, it is imperative that as a health care provider Ridgeview conducts business, cares for patients, and serves our region in an ethical manner.

**MISSION**

Ridgeview exists to enhance the lifelong health of the people it serves with a culture that nurtures the person – mind, body, and spirit.

**VALUES**

All operations must be carried out in line with our values:

1. Patient Centered -The physical, spiritual, intellectual and emotional needs and wants of the patient direct the care we provide.
2. Quality-we deliver high quality healthcare services to patients, families and our communities. Quality permeates all of our systems and we constantly strive for excellence. We use data and evidence to drive decisions.
3. Caring/Respect-we respect the dignity and rights of everyone we serve. We demonstrate caring, compassion and sensitivity through personal service.
4. Community-we are strongly committed to our community relationships and design services and education based on community need.
5. Team Work-we work together to provide quality care and continuously improve our services. Effective teams are built on honesty and respect. We cooperate for the purpose of serving patients' health needs.
6. Environment-we create a warm, friendly atmosphere that is safe, supportive and healing for all who interacts with us.
7. Efficiency-we use resources effectively and are innovative in providing progressive healthcare services. We strive to eliminate all forms of waste.

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Purpose of our Code of Conduct

The Corporate Compliance Program has been established to prevent and detect illegal or unethical behavior, and help us enforce and conform to all federal and state laws that apply to the organization. The Code of Conduct, along with our Corporate Compliance Plan and organizational policies and procedures, are in place to assure compliance with these laws. Our Code of Conduct is a major part of our compliance program and applies to all of Ridgeview's facilities and employees. Compliance is everyone's responsibility. This Code of Conduct demonstrates our commitment to an ethical way of doing business, and provides a support system and framework for doing the right thing.

Ridgeview Medical Center is governed by the conviction that ethical and legal conduct in the workplace setting is equally important as business performance. Our behavior at work affects our success and shapes our reputation. It also communicates our stance on ethics, integrity and honesty. Consequently, we must strive to maintain the highest ethical standards when carrying out our daily work activities.

To help us meet this goal, Ridgeview has established this set of business conduct guidelines, the Code of Conduct. These basic principles provide a framework for our business decisions. Use them as a guide to support Ridgeview's mission and values and our fundamental commitment to fostering an ethical work environment.

**1. Our conduct in the workplace**

*We treat fellow employees, customers, suppliers and other stakeholders with fairness, honesty and respect. This includes refraining from gender or racial bias, or sexual or other harassment. We treat each other in the way we would wish to be treated.*

**Equal employment**

Ridgeview believes in hiring, promoting and compensating employees without regard to race, color, national origin, age, gender, religious preference, marital status, sexual orientation, handicap or disability. We are committed to equal employment practices and comply with all laws, regulations and policies related to non-discrimination.

**Freedom from harassment**

Ridgeview does not condone any form of harassment. This includes harassment based on race, color, religion, gender, national origin, age, sexual orientation, disability or any other basis protected by law. We fully expect employees to report violations to their supervisors, Human Resources representatives, the chief compliance officer or the Compliance Helpline. Harassment can mean different things to different people, so we should all refrain from any offensive or inappropriate behavior. Reports of harassment will be promptly investigated, and employees engaging in this behavior will be disciplined.

**A Safe Environment**

We are all responsible for creating a safe working environment at Ridgeview. Please use safety devices and report any potential or actual hazards to your supervisor. Our policy is to comply with all state and federal laws relative to work place safety. Hazards include security violations or criminal activity that take place on company premises. In addition, please report any injuries or illnesses to your supervisor. Violence has no place at the worksite and will not be tolerated. This includes intimidation, violent acts and threats of violence.

**2. Maintaining confidentiality**

*We honor the privacy of patients' and employees' personal information, whether medical or otherwise, just as we expect our privacy to be protected. In addition, we promise to protect trade secrets and the confidential information that belongs to Ridgeview, otherwise known as "intellectual property," and refrain from divulging information that could be harmful to Ridgeview or that could provide an advantage to our competitors.*

**Confidentiality**

Ridgeview is committed to preserving the right of privacy for all our stakeholders, which includes employees,

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patients, providers, payers and vendors, and protecting Ridgeview's interests. The following information is classified as confidential. Be sure to follow all applicable laws and company policies when using or sharing such information:

- Patients' protected health information, including diagnoses and treatments, personal data, billing and contact information;
- Employee information, including personnel files, evaluations, disciplinary matters and psychological assessments;
- Business information such as financial reports, marketing plans, statistical data, competitive information. This company-specific information is referred to as "intellectual property."

Failure to maintain confidentiality could subject you or Ridgeview to civil and/or criminal lawsuits or give our competitors an unfair advantage.

### 3. Respecting company property

*We treat company property as such. We protect and preserve company property and refrain from using it for personal gain.*

#### Use of resources

Ridgeview discourages *inappropriate* use of company property. Employees are trusted to act responsibly, reasonably and maturely, and to use good judgment in the use of all company-provided communications and computing devices, including but not limited to:

- The Internet;
- All forms of printed and electronic media;
- Copying devices (scanners and copy machines);
- Telephones;
- Cell phones;
- Portable/wireless PDAs;
- Desktop and laptop computers

Employees should not use the computer to transmit, store or download materials that are threatening, maliciously false or obscene. Facilities, equipment, technology and resources are for business purposes - to help you do your job.

### 4. Avoiding conflict of interest

*While employed at Ridgeview, we refrain from any practice or activities that might conflict with Ridgeview's interests. We also avoid accepting or giving gifts to contractors or customers. We do not take advantage of our association with Ridgeview for personal gain.*

#### Activities and relationships beyond Ridgeview

It is important to ensure that our outside activities do not in any way conflict with or pose a hazard to Ridgeview. We avoid personal outside activities or associations that might influence our business decisions or our ability to do our jobs objectively. Also, we avoid doing business with competitors or making significant personal financial investments in competitors, suppliers or customers. Employees are required to disclose to their supervisor or the corporate compliance officer any potential conflict of interests they or their immediate family members have with any organization which does business with Ridgeview or competes with Ridgeview. If you are not sure whether an outside activity represents a conflict of interest, ask your supervisor for help. Also refer to RMC's Code of Ethical Behavior & Business policy.

#### Entertainment, gifts and gratuities

Business entertainment can only be provided or received consistent with what is reasonable under the circumstances, as a token of appreciation and for hospitality, and not for the purpose of influencing the business behavior of the recipient. RMC employees, departments or groups representing RMC are not to accept gifts, entertainment, premiums, food, personal favors or other incentives from a current vendor or a potential new vendor if it could be

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perceived as substantial enough to influence the selection of goods or services for RMC. Similarly, you should refrain from giving or accepting excessive gifts to or from vendors, customers or other business associates. Ridgeview employees should never accept cash gifts from vendors, patients or customers.

#### 5. Addressing health care ethics

*We are accountable for making decisions regarding quality health care in an ethical context. We apply proven scientific principles as we strive to meet the needs of our patients, while taking into account our responsibility for stewardship of finite resources. We commit to work with providers and to focus our resources to continuously improve the health of our patients.*

#### Use of health care resources and quality improvement

We constantly look for ways to improve health outcomes for our community members while effectively managing our resources. Our methods include applying scientific evidence, fairly distributing benefits and care to patients, educating patients and providers, and continuously improving quality. Our goal is to provide *the right care at the right time in the right place*. Ridgeview is committed to complying with state and federal regulations regarding health care, as well as maintaining accreditation by independent review organizations.

#### 6. Obeying the law

*We always uphold the law while working at Ridgeview. This includes, for example, obeying all federal and state regulations with regard to our provision of care and all our business units. We do not condone drug use, fraud, embezzlement or any other illegal activities.*

#### Regulatory obligations

We are regulated by numerous federal, state and local agencies. Some of our regulated business practices cover:

- Ensuring medical services and business practices meet quality improvement standards and protect patient rights and confidentiality
- Managing provider networks and health care delivery systems to make certain they are accessible to our patients and they meet contractual requirements
- Monitoring the appropriate utilization of health care resources
- Providing for prompt handling of patients' complaints
- Submitting and processing claims accurately and promptly
- Conducting marketing activities ethically and within established regulations and guidelines
- Promoting a work environment for employees that's safe, and founded on principles of equal employment and non-discrimination
- Ensuring the accuracy of Ridgeview's financial statements and following other regulations that apply to non-profit organizations

#### External audits and reviews

From time to time, we will have outside parties on site to perform financial and regulatory audits and reviews of our financial statements, operations and business practices. These outside parties include independent auditors, and federal and state government regulators and inspectors. It is Ridgeview's policy to fully cooperate with these auditors and provide them with all necessary information. During these audits or inspections, you must never conceal, destroy or alter any documents or give any false or misleading statements to examiners. Also, you should never provide inaccurate information or obstruct, mislead or delay communication of information or records about a possible violation of law.

#### Tax Requirements

As a nonprofit, tax-exempt entity, RMC has a legal and ethical obligation to act in compliance with applicable laws, to engage in activities to further its charitable purpose, and to ensure that its resources are used in a manner that



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benefits the public good rather than the private or personal interests of any individual.

#### **Illegal activities**

Ridgeview and its employees will not engage, directly or indirectly, in any corrupt business practices or other illegal activities. Such activities include, but are not limited to, fraud, embezzlement, kickback arrangements and drug use. Fraud includes such things as falsifying timecards and expense reports. Health care fraud occurs when someone schemes to defraud any health benefit program. This includes using false pretenses, representations or promises to get money or property owned by any health care program with the delivery of, or payment for, benefits, goods or services. A kickback arrangement involves accepting or offering bribes or payoffs intended to induce, influence or reward favorable decisions (such as the referral of patients) of any person or entity in a position to benefit Ridgeview. Such persons or entities include patients, providers, contractors, and vendors.

#### **Antitrust and unfair competition**

Antitrust laws make sure competition between companies is fair. These laws also protect the public against business competitors who band together or “collude” to unfairly set prices. You could be breaking these laws if you do things as simple as discuss with competitors RMC’s pricing, terms and conditions of sales, or dealings with customers, suppliers or other competitors. All employees are required to comply with applicable antitrust laws.

#### **Political contributions**

Ridgeview does not participate or intervene in any political campaign on behalf of or in opposition to any candidate for public office. While Ridgeview supports employee participation in the political process, employees are not permitted to use positions in Ridgeview to try to influence the personal decisions of others to contribute or otherwise support political parties or candidates except as lawfully permitted through political action committees. Ridgeview may participate in lobbying activities or advocating the passage or defeat of certain legislation that pertains to issues that affect the healthcare community.

#### **Marketing and advertising standards**

We are committed to fair, forthright and legally compliant marketing practices. When advertising our products and services, we will present only truthful, non-deceptive information. We follow state and federal laws pertaining to copyright protection. This includes laws that prohibit duplication of print materials, licensed computer software and other copyright protected works.

### **7. Employee Responsibilities**

*Ridgeview will provide you with the training and education you need to be knowledgeable about our ethics and compliance program. In return, the company relies on you to help ensure that those initiatives remain a priority. This involves upholding all of the standards outlined in these guidelines, as well as reporting any suspected violations of those standards. If you observe potential violations of law or the company code of conduct, you should not hesitate to report such issues; failure to do so could pose a risk to Ridgeview or, in the case of illegal activities or regulatory violations, a risk to you, co-workers or patients.*

#### **Reporting suspected violations**

If you have an ethics or compliance suspicion or issue to report, talk to your supervisor or the chief compliance officer. You may also report issues through the Compliance Hotline – a service that allows employees to communicate violations or concerns privately and anonymously. The Helpline is operated offsite by a third-party administrator and is available toll-free 24 hours a day, seven days a week, at 1-800-398-1496. In addition, available to all employees is a reporting web site at [www.lighthouse-services.com](http://www.lighthouse-services.com). The username is Ridgeview and the password is Compliance.

#### **Resolution, communication and non-retaliation**

Once a problem or suspected violation has been reported, Ridgeview pledges to quickly investigate and resolve the problem. Ridgeview will not retaliate against you for reporting ethics or compliance violations in good faith. No employee is permitted to engage in retaliation against another employee for reporting compliance-related



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concerns.

**Consequences of violations**

Ridgeview will be thorough and fair when investigating possible ethics or compliance violations. Employees who are deemed to have committed violations will be subject to appropriate disciplinary action, up to and including immediate termination.

**Where to find your answers – additional ethics and compliance resources**

The Code of Conduct is meant to provide an overview of Ridgeview's standards on ethics, compliance and conduct-related issues. This publication is a living document and is subject to change as we refine our policies and procedures, and as government agencies and regulators modify their rules and guidance.

If you need clarification or more information or if you have an ethics- or compliance-related question or concern, the best thing to do is talk with your supervisor or your compliance representative. They are the best sources when you need help understanding the laws, regulations and practices that affect your work. You may also call the Compliance Hotline if you wish to seek information on a specific company policy or standard, or if you have a concern or question that you are not comfortable bringing to your supervisor or compliance representative.

In addition, employees are encouraged to explore the following resources:

- **Ridgeview's employee handbook:** The handbook covers various topics, including employment, benefits, performance reviews, wage and salary, and employee relations subjects such as dress code, workplace conduct, counseling, and health and safety issues.
- **Ridgeview's Intranet site:** [www.ridgetonline.org](http://www.ridgetonline.org). This site contains extensive information on company policies and procedures and other company standards that affect your work activities.